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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

CHRISTOPHER KOHLS,  
Plaintiff,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

Case No. 2:24-cv-02527-JAM-CKD

**STIPULATION RE CONSOLIDATION**

**Judge:** John A. Mendez

THE BABYLON BEE, LLC, et al.,  
Plaintiffs,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

Case No. 2:24-cv-02787-JAM-CKD

RUMBLE, INC., et al.,  
Plaintiffs,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

Case No. 2:24-cv-03315-JAM-CKD

X CORP.,  
Plaintiff,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

Case No. 2:24-cv-03162-JAM-CKD

**STIPULATION**

1  
2       1.     This Court recognized that the above-entitled actions  
3 are related within the meaning of Local Rule 123. Related Case  
4 Order, ECF No. 13. It previously ordered the *Kohls v. Bonta*, No.  
5 2:24-cv-02527-JAM-CKD, and *The Babylon Bee, LLC v. Bonta*, No. 2:24-  
6 cv-02787-JAM-CKD, matters consolidated. Order Consolidating Cases,  
7 *Kohls v. Bonta*, No. 2:24-cv-02527 (E.D. Cal. Oct. 25, 2024), ECF  
8 No. 20.

9       2.     Plaintiffs in all four of the above-entitled actions  
10 challenge the same California statute: AB 2655 (Cal. Elec. Code §  
11 20510). Plaintiffs Christopher Kohls, The Babylon Bee, LLC, and  
12 Kelly Chang Rickert also challenge AB 2839 (Cal. Elec. Code §  
13 20012).

14       3.     Plaintiffs in all four of the above-entitled actions  
15 bring the same or similar constitutional claims against the same  
16 Defendants: California Attorney General Rob Bonta and Secretary of  
17 State Shirley N. Weber. Plaintiffs in *Rumble* and *X Corp.* also bring  
18 Section 230 claims against AB 2655 and against the same Defendants.

19       4.     All parties in the above-entitled matters consent to  
20 consolidation of these actions.

21       NOW THEREFORE, the parties hereby STIPULATE that:

22       5.     The above-entitled actions shall be consolidated for all  
23 purposes.  
24

1 Dated: December 23, 2024

2 By: /s/ Joel Kurtzberg  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

CHRISTOPHER KOHLS,  
Plaintiff,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

Case No. 2:24-cv-02527-JAM-CKD  
**[PROPOSED] ORDER TO CONSOLIDATE**  
**Judge:** John A. Mendez

THE BABYLON BEE, LLC, et al.,  
Plaintiffs,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

Case No. 2:24-cv-02787-JAM-CKD

RUMBLE, INC., et al.,  
Plaintiffs,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

Case No. 2:24-cv-03315-JAM-CKD

X CORP.,  
Plaintiff,  
v.  
ROBERT A. BONTA, et al.,  
Defendants.

Case No. 2:24-cv-03162-JAM-CKD

Before the Court is Plaintiffs Christopher Kohls, The Babylon Bee, LLC, Kelly Chang Rickert, Rumble Inc., Rumble Canada Inc., X Corp., and Defendants Rob Bonta and Shirley N. Weber's joint stipulation to consolidate *Kohls v. Bonta*, No. 2:24-cv-02527-JAM-CKD, with *Rumble, Inc. v. Bonta*, No. 2:24-cv-03315-JAM-CKD, and *X Corp. v. Bonta*, No. 2:24-cv-03162-JAM-CKD. Good cause appearing, the Court makes the following orders:

1. Pursuant to Fed. R. Civ. P. 42, the actions denominated as *Kohls v. Bonta, et al.*, No. 2:24-cv-02527-JAM-CKD, *Rumble, Inc. v. Bonta*, No. 2:24-cv-03315-JAM-CKD, and *X Corp. v. Bonta*, No. 2:24-cv-03162-JAM-CKD are hereby **CONSOLIDATED** for all purposes;

2. Case No. 2:24-cv-02527-JAM-CKD is designated as the "master file;"

3. The Clerk of the Court is **DIRECTED** to add all complaints and answers filed in Case Nos. 2:24-cv-03315-JAM-CKD and 2:24-cv-03162-JAM-CKD to the master file;

4. The Clerk of the Court is **DIRECTED** to **ADMINISTRATIVELY CLOSE** Case Nos. 2:24-cv-03315-JAM-CKD and 2:24-cv-03162-JAM-CKD; and

5. The parties are **DIRECTED** to file all future pleadings, motions, and other filings ONLY in Case No. 2:24-cv-02527-JAM-CKD.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
Honorable John A. Mendez  
Senior United States District Judge

**PROOF OF SERVICE**

I hereby certify that I caused to be filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all attorneys of record in this case.

Dated: December 23, 2024

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